

1 Anna Y. Park, CA SBN 164242
2 Sue J. Noh, CA SBN 192134
3 U.S. EQUAL EMPLOYMENT
4 OPPORTUNITY COMMISSION
5 255 East Temple Street, Fourth Floor
6 Los Angeles, CA 90012
7 Telephone: (213) 894-1083
8 Facsimile: (213) 894-1301
9 E-mail: lado.legal@eeoc.gov

10 Nechole Garcia, NV SBN 12746
11 U.S. EQUAL EMPLOYMENT
12 OPPORTUNITY COMMISSION
13 333 Las Vegas Boulevard South, Suite 8112
14 Las Vegas, Nevada 89101
15 Telephone: (702) 388-5072
16 Facsimile: (702) 388-5094

17 Attorneys for Plaintiff
18 U.S. EQUAL EMPLOYMENT
19 OPPORTUNITY COMMISSION

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 EQUAL EMPLOYMENT OPPORTUNITY) Case No. 2:18-cv-01227-JAD-VCF
23 COMMISSION,)
24 Petitioner,) **JOINT STIPULATION AND**
25 v.) **ORDER VACATING HEARING**
26) **DATE AND SETTING DATE FOR**
27) **JOINT STATUS REPORT**
28 SBEIG HOLDINGS, LLC dba HYDE)
BELLAGIO, SPOONFUL MANAGEMENT LV,)
LLC,)
Respondents.)

29 The Petitioner U.S. Equal Employment Opportunity Commission (“EEOC”) and
30 Respondents SBEIG Holdings, LLC dba Hyde Bellagio and Spoonful Management LV, LLC
31 (hereinafter collectively referred to as “Respondents”) hereby agree and stipulate to the
32 following:
33

1. On July 5, 2018, the EEOC filed an Application to Show Cause as to why its Subpoena
2 *duces tecum* (Subpoena No. LV-017-03) served on Respondents should not be enforced. In
3 addition to the Application, the EEOC filed a Proposed Order to Show Cause, Memorandum of
4 Points and Authorities, and supporting documents. (ECF No. 1).

5. On July 11, 2018, Magistrate Judge Cam Ferenbach scheduled a Show Cause Hearing
6 for August 23, 2018 at 10:00 a.m. (ECF No. 2). Judge Ferenbach also ordered Respondents to
7 file a Response to the EEOC's Application to Show Cause by July 31, 2108, and the EEOC to
file its Reply to Respondents' Response by August 7, 2018. (ECF No. 2).

8. The parties are engaged in efforts to resolve the subpoena enforcement action currently
9 before the Court. On July 20, 2018, Respondents emailed documents to the EEOC responsive
10 to Subpoena No. LV-17-03 request numbers one and ten.

11. On July 27, 2018, Respondents notified the EEOC that they would need an additional
12 two (2) weeks to produce documents responsive to the remaining subpoena requests.
13 Respondents are diligently working to produce the documents by August 10, 2018.

14. In light of Respondents' need to for additional time to produce documents responsive to
the remaining requests for Subpoena LV-17-03, the parties stipulate to an order as follows:

15. a. The July 31, 2018 response due date, the August 7, 2018 reply date, and the
16 August 23, 2108 hearing date are vacated;
17. b. Respondents shall work diligently to produce all responsive documents in
18 compliance with the EEOC's Subpoena by August 10, 2018;
19. c. The parties shall provide the Court with a joint status report by **August 17, 2018**
20 regarding whether Respondents have fully complied with Subpoena No. LV-17-
21 03.

22 Respectfully submitted,

23 DATED: July 30, 2018

24 U.S. EQUAL EMPLOYMENT
25 OPPORTUNITY COMMISSION

27 /s/ Nechole Garcia

28 Nechole Garcia
Attorney for the EEOC

DATED: July 30, 2018

SBEEG HOLDINGS, LLC
SPOONFUL MANAGEMENT LV, LLC

/s/ Jacqueline Godoy

Jacqueline Godoy
Attorney for Respondents

1 **ORDER UPON STIPULATION**
2

3 IT IS SO ORDERED.
4

5 Dated: 7-31-2018
6



7

8 UNITED STATES MAGISTRATE JUDGE
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Anna Y. Park, CA SBN 164242
2 Sue J. Noh, CA SBN 192134
3 U.S. EQUAL EMPLOYMENT
4 OPPORTUNITY COMMISSION
5 255 East Temple Street, Fourth Floor
6 Los Angeles, CA 90012
7 Telephone: (213) 894-1083
8 Facsimile: (213) 894-1301
9 E-mail: lado.legal@eeoc.gov

10 Nechole Garcia, NV SBN 12746
11 U.S. EQUAL EMPLOYMENT
12 OPPORTUNITY COMMISSION
13 333 Las Vegas Boulevard South, Suite 8112
14 Las Vegas, Nevada 89101
15 Telephone: (702) 388-5072
16 Facsimile: (702) 388-5094

17 Attorneys for Plaintiff
18 U.S. EQUAL EMPLOYMENT
19 OPPORTUNITY COMMISSION

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 EQUAL EMPLOYMENT OPPORTUNITY) Case No. 2:18-cv-01227-JAD-VCF
23 COMMISSION,)
24 Petitioner,)
25)
26 v.)
27)
28)
29 SBEEG HOLDINGS, LLC dba HYDE)
30 BELLAGIO, SPOONFUL MANAGEMENT LV,))
31 LLC,)
32 Respondents.)

1 I am, and was at the time the herein mentioned mailing took place, a citizen of the
2 United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

3 I am employed in the Legal Unit of the Las Vegas Local Office of the United States
4 Equal Employment Opportunity Commission.

5 My business address is U.S. Equal Employment Opportunity Commission, Las Vegas
6 Local Office, 333 Las Vegas Boulevard South, Ste 5560, Las Vegas, NV 89101.
7

8 On the date that this declaration was executed, as shown below, I served the foregoing

9 **JOINT STIPULATION AND [PROPOSED] ORDER VACATING HEARING DATE**
10 **AND SETING DATE FOR JOINT STATUS REPORT**, by first class mail to Respondents
11 SBEEG Holdings, LLC dba Hyde Bellagio and Spoonful Management LV, LLC, c/o STOKES
12 WAGNER at 600 West Broadway, Suite 910, San Diego, CA 92101:
13

14 Jacqueline A. Godoy
15 NV Bar No. 11385
16 600 West Broadway, Suite 910
17 San Diego, CA 92101
jgodoy@stokeswagner.com

18 I declare under penalty of perjury that the foregoing is true and correct.
19 Executed on July 30, 2018, at Las Vegas, NV.

20
21 /s/ Nechole Garcia
22 Nechole Garcia
23
24
25
26
27
28